

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

RUBY STREETER,)
)
Plaintiff,)
)
v.) **Civil Action No. 1:07cv97-WKW**
)
OFFICE OF DOUGLAS R. BURGESS, LLC,)
and DOUGLAS R. BURGESS,)
)
Defendants.)

**Defendants Office of Douglas R. Burgess, LLC and Douglas R. Burgess's
Response to Plaintiff's Motion to Compel and Plaintiff's
Motion to Deep Requests for Admission Admitted.**

COMES NOW, Defendants Office of Douglas R. Burgess, LLC and Douglas R. Burgess and responds to Plaintiff's Motion to Compel as follows:

1. Defendants provided responses, pro se, to the Plaintiffs Discovery Requests to counsel for the Plaintiff on June 26, 2007.
2. Defendants informed the Plaintiff's counsel that Defendants were not represented by counsel and that the discovery responses had not been reviewed by any previous or new counsel.
3. Defendant, Douglas R. Burgess informed the Plaintiff that he was in the process of trying to retain local counsel and that he would supplement the discovery responses as soon as possible.
4. Defendants have obtained new local counsel as of July 11, 2007.
5. On July 25, 2007, Defendants sent to Plaintiff's counsel completed responses to Interrogatories, Requests for Production and Requests for Admissions.

6. Plaintiff has not been unduly burdened or prejudiced by the delay in responding in discovery.

WHEREFORE, Defendants respectfully request that this Court deny the Plaintiff's Motion to Compel.

Respectfully submitted this the 25th day of July, 2007.

/s/ W. McCollum Halcomb

W. McCollum Halcomb (HAL030)
ASB 9223-M71W
Attorney for Defendants
HALCOMB & WERTHEIM, PC
Post Office Box 12005
Birmingham, AL 35202-2005
(205) 251-0007
(205) 251-0017 facsimile
mac@hw-al.com

/s/ India A. Ramey

India A. Ramey (SMI246)
ASB 8345-D48S
Attorney for Defendants
HALCOMB & WERTHEIM, PC
Post Office Box 12005
Birmingham, AL 35202-2005
(205) 251-0007
(205) 251-0017 facsimile
iramey@hw-al.com

Certificate of Service

I hereby certify that I have served the Notice of Appearance upon counsels for the Plaintiff, via US Mail, postage prepaid, this the 25th day of July 2007, to the following address:

David G. Poston
Walter A. Blakeney
Michael D. Brock
Gary W. Stout
BROCK & STOUT
Post Office Drawer 311167
Enterprise, AL 36330

/s/ W. McCollum Halcomb

W. McCollum Halcomb